

# EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU Proposal	Court's Default	Salesforce Proposal	Item
<b>July 14, 2021</b>	July 14, 2021		The Parties shall submit an agreed Scheduling Order. If the parties cannot agree, the parties shall submit a separate Joint Motion for entry of each Order briefly setting forth their respective positions on items where they cannot agree. Absent agreement of the parties, the Plaintiff shall be responsible for the timely submission of this and other Joint filings.
<b>August 18, 2021</b>	August 18, 2021	August 25, 2021	Defendant serves preliminary invalidity contentions in the form of (1) a chart setting forth where in the prior art references each element of the asserted claim(s) are found, (2) an identification of any limitations the Defendant contends are indefinite or lack written description under section 112, and (3) an identification of any claims the Defendant contends are directed to ineligible subject matter under section 101. Defendant shall also produce (1) all prior art referenced in the invalidity contentions, (2) technical documents, including software where applicable, sufficient to show the operation of the accused product(s), and (3) summary, annual sales information for the accused product(s) for the two years preceding the filing of the Complaint, unless the parties agree to some other timeframe.

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<b>September 1, 2021</b>	September 1, 2021	September 8, 2021	Parties exchange claim terms for construction.
<b>September 15, 2021</b>	September 15, 2021	September 22, 2021	Parties exchange proposed claim constructions.
<b>September 22, 2021</b>	September 22, 2021	September 29, 2021	Parties disclose extrinsic evidence. The parties shall disclose any extrinsic evidence, including the identity of any expert witness they may rely upon in their opening brief with respect to claim construction or indefiniteness. With respect to any expert identified, the parties shall identify the scope of the topics for the witness's expected testimony. With respect to items of extrinsic evidence, the parties shall identify each such item by production number or produce a copy of any such item if not previously produced.
<b>N/A</b>		September 29, 2021	<b>Pre-Markman license discovery closes.</b> Salesforce requests limited pre-Markman discovery into a case dispositive license defense for all ten asserted WSOU patents of no more than 10 document requests, 5 interrogatories, and two depositions.
<b>September 29, 2021</b>	September 29, 2021	October 6, 2021	Deadline to meet and confer to narrow terms in dispute and exchange revised list of terms/constructions.
<b>October 6, 2021</b>	October 6, 2021	October 6, 2021	Defendant files Opening claim construction brief, including any arguments that any claim terms are indefinite.
<b>October 27, 2021</b>	October 27, 2021	November 3, 2021	Plaintiff files Responsive claim construction brief.

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<b>November 10, 2021</b>	November 10, 2021	November 17, 2021	Defendant files Reply claim construction brief.
<b>November 24, 2021</b>	November 24, 2021	December 1, 2021	Plaintiff files Sur-Reply claim construction brief.
<b>November 30, 2021</b>	November 30, 2021	December 7, 2021	Parties submit Joint Claim Construction Statement  See General Issues Note #8 regarding providing copies of the briefing to the Court and the technical advisor (if appointed).
<b>December 1, 2021</b>	December 1, 2021	December 8, 2021	Parties submit optional technical tutorials to the Court and technical advisor (if appointed).
<b>December 8, 2021</b>	December 8, 2021	December 15, 2021	<i>Markman</i> hearing at 9:00 a.m.
<b>December 9, 2021</b>	December 9, 2021	January 5, 2022	Fact Discovery opens; deadline to serve Initial Disclosures per Rule 26(a).
<b>January 19, 2022</b>	January 19, 2022	February 16, 2021	Deadline to add parties.
<b>February 2, 2022</b>	February 2, 2021	February 23, 2022	Deadline to serve Final Infringement and Invalidity Contentions. After this date, leave of Court is required for any amendment to Infringement or Invalidity contentions. This deadline does not relieve the Parties of their obligation to seasonably amend if new information is identified after initial contentions.
<b>March 30, 2022</b>	March 30, 2022	March 23, 2022	Deadline to amend pleadings. A motion is not required unless the amendment adds patents or claims.
<b>June 1, 2022</b>	June 1, 2022	July 6, 2022	Deadline for the first of two meet and confers to discuss

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			significantly narrowing the number of claims asserted and prior art references at issue. Unless the parties agree to the narrowing, they are ordered to contact the Court's Law Clerk to arrange a teleconference with the Court to resolve the disputed issues.
<b>June 29, 2022</b>	July 29, 2022	August 3, 2022	Close of Fact Discovery.
<b>July 6, 2022</b>	July 6, 2022	August 31, 2022	Opening Expert Reports.
<b>August 3, 2022</b>	August 3, 2022	September 28, 2022	Rebuttal Expert Reports.
<b>August 24, 2022</b>	August 24, 2022	October 26, 2022	Close of Expert Discovery.
<b>August 31, 2022</b>	<b>August 31, 2022</b>	November 2, 2022	Deadline for the second of two meet and confers to discuss narrowing the number of claims asserted and prior art references at issue to triable limits. To the extent it helps the parties determine these limits, the parties are encouraged to contact the Court's Law Clerk for an estimate of the amount of trial time anticipated per side. The parties shall file a Joint Report within 5 business days regarding the results of the meet and confer.
<b>September 7, 2022</b>	September 7, 2022	November 9, 2022	Dispositive motion deadline and <i>Daubert</i> motion deadline.
	N/A	December 7, 2022	Oppositions to dispositive motion deadline and <i>Daubert</i> motion deadline.

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	N/A	December 28, 2022	Replies to dispositive motion deadline and <i>Daubert</i> motion deadline.
<b>September 21, 2022</b>	September 21, 2022	January 11, 2023	Serve Pretrial Disclosures (jury instructions, exhibit lists, witness lists, discovery and deposition designations).
<b>October 5, 2022</b>	October 5, 2022	January 25, 2023	Serve objections to pretrial disclosures/rebuttal disclosures.
<b>October 12, 2022</b>	October 12, 2022	February 1, 2023	Serve objections to rebuttal disclosures and file motions <i>in limine</i> .
<b>October 19, 2022</b>	October 19, 2022	February 8, 2023	File Joint Pretrial Order and Pretrial Submissions (jury instructions, exhibit lists, witness lists, discovery and deposition designations); file oppositions to motions <i>in limine</i> .
<b>October 26, 2022</b>	October 26, 2022	February 15, 2023	File Notice of Request for Daily Transcript or Real Time Reporting. If a daily transcript or real time reporting of court proceedings is requested for trial, the party or parties making said request shall file a notice with the Court and e-mail the Court Reporter, Kristie Davis at <a href="mailto:kmdaviscsr@yahoo.com">kmdaviscsr@yahoo.com</a> . Deadline to meet and confer regarding remaining objections and disputes on motions <i>in limine</i> .
<b>November 4, 2021</b>	November 4, 2022	February 24, 2023	File joint notice identifying remaining objections to pretrial disclosures and disputes on motion <i>in limine</i> .

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<b>November 9, 2022</b>	November 9, 2022	March 1, 2023	Final Pretrial Conference.
<b>December 5, 2022</b>	December 5, 2022	N/A	Jury Selection/Trial.
	N/A	April 5, 2023	Jury Selection/Trial for three of the above captioned cases.
	N/A	TBD	Jury Selection/Trial for three of the above captioned cases.
	N/A	TBD	Jury Selection/Trial for remaining cases of the above captioned cases.

SIGNED this \_\_\_\_ day of \_\_\_\_\_, 2021

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ALAN D ALBRIGHT  
UNITED STATES DISTRICT JUDGE